

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

NICOLE KOLB, on behalf of herself and all others  
similarly situated,

Plaintiff,

v.

CONIFER VALUE-BASED CARE, LLC,  
CONIFER HEALTH SOLUTIONS, LLC,  
CONIFER REVENUE CYCLE SOLUTIONS,  
LLC, and TENET HEALTHCARE  
CORPORATION,

Defendants.

Case No.: 3:23-cv-744-E-BN

WILLIAM TANG, on behalf of himself and all  
others similarly situated,

Plaintiff,

v.

CONIFER VALUE-BASED CARE, LLC,  
CONIFER HEALTH SOLUTIONS, LLC,  
CONIFER REVENUE CYCLE SOLUTIONS,  
LLC, and TENET HEALTHCARE  
CORPORATION,

Defendants.

Case No.: 3:23-cv-870-E-BN

**ORDER TO CONSOLIDATE**

This matter is before the Court on Plaintiffs Nicole Kolb and William Tangs' Unopposed Motion to Consolidate (the "Motion") pursuant to Fed. R. Civ. P. 42(a). Upon consideration of the Motion, and the Court having reviewed the pleadings filed by the parties herein, it is hereby ORDERED that Plaintiffs' Motion is GRANTED.

**IT IS HEREBY ORDERED THAT:**

1. The following two (2) related proposed class actions pending in the United

States District Court Northern District of Texas shall be consolidated into one action (the “Consolidated Action”) before this Court:

- a. *Nicole Kolb v. Conifer Value-Based Care, LLC, Conifer Health Solutions, LLC, Conifer Revenue Cycle Solutions, LLC, and Tenet Healthcare Corporation* (Case No. 3:23-cv-744-E-BN); and
- b. *William Tang v. Conifer Value-Based Care, LLC, Conifer Health Solutions, LLC, Conifer Revenue Cycle Solutions, LLC, and Tenet Healthcare Corporation* (Case No. 3:23-cv-870-E-BN)  
(Collectively, the “Actions”)

2. All orders, pleadings, motions, and other documents served or filed in this Consolidated Action shall have the caption: *In re: Conifer Data Security Breach Litigation* Case No. 3:23-cv-744-E-BN;

3. All orders, pleadings, motions, and other documents served or filed in this Consolidated Action shall bear the legend “(Consolidated with [giving the docket numbers of all the other cases]).”;

4. Any related cases filed after entry of this Order in this Court may be consolidated with the Consolidated Action on appropriate order of the Court;

5. The deadline to file application(s) for appointment of Interim Class Counsel shall be by **Monday, June 5, 2023**;

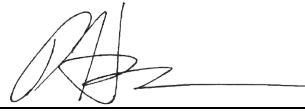
6. The deadline for the filing of a Consolidated Complaint shall be 60 days after the appointment of Interim Class Counsel; and

7. All deadlines for all Defendants to file a responsive pleading are stayed until Plaintiffs file a Consolidated Amended Complaint and Defendants shall have 45

days to file a responsive pleading after Plaintiffs file a Consolidated Amended Complaint.

SO ORDERED.

Dated: May 15, 2023

A handwritten signature in black ink, appearing to be 'RJ' followed by a horizontal line.

---

U.S. MAGISTRATE JUDGE